

During drafting, Plaintiff/Counterclaim-Defendant's counsel, Heather Abreu's son fell ill to a severe asthma attack causing her son to be rushed to the emergency room for acute care. Counsel has been tending to her child. As a result, more time is necessary finish the response.

While plaintiff/counterclaim-defendant intends to expeditiously work toward completion of a response to defendants' summary judgment motion and supporting materials, the undersigned is committed to drafting a response in the related matter also pending with this court and due at the same date. Accordingly, a full twenty-one-day extension will be needed.

For the forgoing reasons, it is respectfully requested that this motion for an extension of time of twenty-one days for plaintiff/counterclaim-defendant to file a response to a motion for summary judgment, up to and including November 1, 2022, be granted.

Respectfully submitted,
KD PHILLIPS LAW FIRM, PLLC

By: /s/ Kerri Phillips

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Certificate of Conference

I emailed Sanford Denison, William Osbourne and Michael Rake, attorneys for defendants on October 5, 2022 to discuss the filing of this motion. None of the attorneys responded to the email regarding the filing of this motion.

/s/ Kerri Phillips
Kerri Phillips, Esq.

Certificate of Service

I certify that on this 5th day of October 2022, a true and correct copy of the foregoing document was sent to all counsels of record, hereunder listed via ECF Filing as permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure.

William Osbourne
Sanford Denison
Michael Rake

/s/ Kerri Phillips
Kerri Phillips, Esq.

